

Review Comments
Stormwater Assessment Work Plan
Hampton Reload Yard
4950 NW Front Avenue
Portland, Oregon
ECSI #5761
Dated September 1, 2015

Submitted December 2, 2015

Following are the United States Environmental Protection Agency's (EPA) comments on the September 1, 2015 document entitled, Stormwater Assessment Work Plan, Hampton Reload Yard, 4950 NW Front Avenue, Portland, Oregon (Work Plan), prepared by Bridgewater Group, Inc. on behalf of Hampton Affiliates, Inc. (Hampton). The site is located adjacent to the west bank of the lower Willamette River and is immediately downstream of the City of Portland's Outfall No. 19, which discharges to the Willamette River at approximately RM 8.4W. The property is listed as ECSI #5761 (Hampton Lumber), and is adjacent to the inwater actions being evaluated for Sediment Management Area (SMA) at RM8.4W (Area of Potential Concern, AOPC 18).

EPA understands the purpose of the Work Plan is to determine if hazardous substances are present at the Hampton site as sources of contamination that may impact the Willamette River. The Work Plan was prepared pursuant to the Letter Agreement between Hampton and the Oregon Department of Environmental Quality (DEQ) dated October 26, 2012. This version of the Work Plan addresses DEQ's August 2014 comments and incorporates comments from a meeting with DEQ on August 10, 2015.

General Comments

1. The table below summarizes current information and EPA's recommendations for the Hampton Reload Yard site. Stormwater characterization data collected per the Work Plan should be used to complete a Source Control Evaluation (SCE) that evaluates the potential risk of stormwater contamination from this site. Additional stormwater Source Control Measures (SCMs) may be needed as a result of the SCE.
2. Five Contaminants of Interest (COIs) are missing from the proposed list of constituents for catch basin solids and stormwater. To properly determine the risk of recontamination from this site, it is recommended that all COIs be analyzed. See Specific Comments #4 and #6 below.
3. The work plan outlines three stormwater sampling locations, while the site has five outfalls to the Willamette River. Specific comment #5b recommends two additional stormwater sampling

locations to provide adequate characterization of the types and concentrations of contaminants discharging to the Willamette River.

EPA Site Status Summary – Hampton Reload Yard Site

Question	Answer	Description
Are source control measures being implemented?	Yes	Stormwater source control measures include : the cleanout of solids from the stormwater system from March 7 - 9 of 2012; monthly vacuum sweeping of paved areas of the site; and the installation and maintenance of catch basin liners in 13 of the 14 onsite catch basins.
Are there JSCS SLV exceedances?	NA	No stormwater results presented; comparisons to JSCS SLVs and magnitudes of exceedances should be presented in the SCE Report.
Are there stormwater PRG exceedances?	NA	No stormwater results presented; comparisons to applicable PRGs (RAOs 3 and 7) should be presented in the SCE Report.
Are pollutant concentrations typical of Portland Harbor industrial sites (e.g. below the knee of the curve)?	NA	No stormwater results presented; comparisons to DEQ's rank-order curves should be presented in the SCE Report.
Are stormwater COCs from this site the same as those defined for the associated SDU?	NA	Site COCs not established. COIs for the AOPC 18 (SMA at RM8.4W) include aluminum, barium, cadmium, copper, iron, manganese, mercury, silver, zinc, PCBs, PAHs, delta-HCCH, dieldrin, endrin, and chloroethane.
Do sampled stormwater events meet JSCS criteria?	NA	Stormwater sampling has not been completed; methods presented in Work Plan do meet JSCS criteria.
Is further stormwater data collection recommended?	Yes	Implement the Work Plan considering EPA comments presented herein.
Are additional source control measures recommended?	NA	To be determined based on results of SCE.

Specific Comments

1. Section 2.3 Stormwater Conveyance System:
 - a. Appendix A of the DEQ Guidance for Evaluating the Stormwater Pathway to Upland Site (DEQ Appendix A) states that a site drainage map includes “all conveyances with arrows indicating the direction of flow in all portions of the stormwater system and the diameters of the conveyance pipes.” This information should be added to Figure 2.
 - b. Modifying or retrofitting catch basin 10 (CB10) with a catch basin insert should be considered prior to implementing the Work Plan.
2. Section 4: Previous Environmental Investigations and Cleanups:
 - a. Present the June 2004 groundwater investigation results in summary tables and format according to DEQ Appendix A, Section 4.
 - b. The text states: “Arsenic, cadmium, silver and zinc were not detected and the method reporting limits (MRLs) were less than the SLVs, except for arsenic (20 micrograms per liter [$\mu\text{g/L}$] versus $0.045 \mu\text{g/L}$). The MRL for total and dissolved cadmium was $1 \mu\text{g/L}$ which is almost equal to the SLV of $0.094 \mu\text{g/L}$.” These sentences should be revised since the cadmium MRL ($1 \mu\text{g/L}$) was 10 times greater than the SLV ($0.094 \mu\text{g/L}$). Lower MRLs should be used for future arsenic and cadmium analyses if possible.
3. Section 5: Stormwater Pollution Prevention and Control Measures: Implementation of an employee education and training program is recommended for spill prevention and response activities related to the 6,000-gallon diesel aboveground storage tank (AST) on the property. Regular inspections of the AST should also be conducted per SPCC requirements.
4. Section 6.2 Stormwater Solids Analytical Suite: The Hampton Reload Yard discharges stormwater to AOPC 18 that has the following Contaminants of Interest (COIs): aluminum, barium, cadmium, copper, iron, manganese, mercury, silver, zinc, PCBs, PAHs, delta-HCCH, dieldrin, endrin, and chloroethane. Table 1 of the work plan does not include aluminum, barium, iron, delta-HCCH, and chloroethane in the list of proposed constituents to be analyzed. It is recommended that samples of catch basin solids and be analyzed for all COIs to evaluate the risk of Willamette River recontamination from this site.
5. Section 6.2 Stormwater Sampling Locations:
 - a. The section number (Section 6.2) is repeated. Section numbers should be corrected at Section 6.2 Stormwater Sampling Locations through the rest of section 6.

- b. The following two additional sampling locations are recommended to properly characterize the site:
 - i. CB7 (Outfall WR-379 not accessible): Drainage Area 1 accounts for 49% of the site area and has the largest amount of truck traffic and material storage. Based on Figure 2, CB-7 accounts for a large amount of the runoff in Drainage Area 1 and should therefore be sampled.
 - ii. CB8 (Outfall WR-378 not accessible). The Work Plan currently excludes sample collection from Drainage Area 2. Sample collection at CB8 is recommended to characterize stormwater discharged to outfall WR-378.
- 6. Section 6.5 Stormwater Analytical Suite: Refer to Specific Comment #4 above regarding site COIs. Stormwater SLVs do exist for aluminum and chloroethane, and all COIs should be evaluated to properly characterize the site and evaluate the potential risk of Willamette River recontamination.